IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

MARCELA SANTANA, Plaintiff	§ §	
	§	CIVIL ACTION NO. 3:11-cv-186
VS.	§	
	§	
FIRST AMERICAN SOLUTIONS,	§	
LLC, CK ASSET HOLDINGS, LLC,	§	
MARK STEVENS AND KENNETH	§	
JONES	§	
Defendants	§	

REQUEST FOR CLERK'S ENTRY OF DEFAULT

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff hereby requests for entry of default judgment against Defendants, First American Solutions, LLC, CK Assets Holdings, LLC, Mark Stevens and Kenneth Jones. Defendants were served via personal service on May 20, 2011. *See* Group Exhibit A. Defendants have offered no explanation for their failure to answer the instant Complaint. Accordingly, Plaintiff seeks default against Defendants in the amount of four thousand four hundred forty three dollars and eighty five cents (\$4,443.85), representing statutory damages in the amount of one thousand dollars (\$1,000.00), 15 U.S.C. \$1692(k)(a)(2)(A), two thousand six hundred ninety nine dollars (\$2,699.00) in attorney fees and seven hundred forty four dollars and eighty five cents (\$744.85) for court costs.

Respectfully submitted,

By: <u>/s/ Dennis R. Kurz</u> Dennis R. Kurz Texas State Bar # 24068183

Request for Clerk's Entry of Default - 1

Attorney in Charge for Plaintiff

WEISBERG & MEYERS, L.L.C. Two Allen Center 1200 Smith Street 16th Floor Houston, TX 77002 (888) 595-9111 ext. 412 (866) 565-1327 (fax)

CERTIFICATE OF SERVICE

I certify that on June 22, 2011, I electronically filed the foregoing document with the clerk of the U.S. District Court, Western District of Texas, El Paso Division, using the electronic case filing system of the court. Copies of the foregoing were sent to below via U.S. mail on this 22nd day of June, 2011.

First American Solutions, LLC CK Asset Holdings, LLC c/o Kenneth Jones 3937 Sunset Blvd. Ste. E. West Columbia, SC 29169

Mark Stevens 110 SCHOOL BUS RD WEST COLUMBIA, SC 29172-2456

> /s/ Dennis R. Kurz Dennis R. Kurz